

MORRIS, NICHOLS, ARSHT & TUNNELL

1201 NORTH MARKET STREET
P.O. Box 1347
WILMINGTON, DELAWARE 19899-1347

302 658 9200
302 658 3989 FAX

MARY B. GRAHAM
(302) 575-7287
mgraham@mnat.com

November 14, 2005

The Honorable Kent A. Jordan
United States District Court
For the District of Delaware
844 King Street
Wilmington, DE 19801

**VIA E-FILING AND
HAND DELIVERY**

Re: *In re TriCor® Antitrust Litigations*
C.A. Nos. 02-1512, 03-120, 05-340 and 05-360 (KAJ)

Dear Judge Jordan:

On behalf of Abbott Laboratories, Fournier Industrie et Santé, and Laboratoires Fournier S.A., the attached (example) documents are being submitted for *in camera* review in connection with the discovery dispute detailed in Abbott's and Fournier's letter of today and plaintiffs' letter of November 10, 2005. The Court, in the October 24, 2005 teleconference, had requested that unredacted documents be submitted for *in camera* review. Complete versions of the documents are attached and we have indicated in yellow where the redactions were made in the documents produced to the plaintiffs.

The following unredacted documents are attached for *in camera* review:

- Exhibit A: Abbott_FTC 0011361-70 (corresponds to Abbott_Tricor 0010794-803)
- Exhibit B: Abbott_FTC 001765-93 (entire document relates to a future product and it was not produced in Abbott_Tricor production)
- Exhibit C: Abbott_FTC 007742-58 (FTC version contains some redactions for privilege and those portions are still redacted in the document given to the Court) (corresponds to Abbott_Tricor 007624-40)
- Exhibit D: Fournier/FTC 0000645-700 (produced to Plaintiffs with redactions on the following pages: 000651, 000669, 000676, and 000680)
- Exhibit E: Fournier/FTC 0001111-1121 (produced to Plaintiffs with redactions on the following pages: 001113 through 001121)
- Exhibit F: Fournier/FTC 0001018-1039 (produced to Plaintiffs with redactions on the following pages: 001020 through 001039)

Respectfully,



Mary B. Graham

MBG/dam

Enclosures

cc: Clerk of Court (by hand and e-filing w/o exhibits)
All counsel of record (by electronic mail w/o exhibits)

492678

HIGHLY CONFIDENTIAL DOCUMENTS OF
ABBOTT AND FOURNIER

SUBMITTED FOR *IN CAMERA* REVIEW

NOVEMBER 14, 2005

EXHIBITS A - F

ALL EXHIBITS CONFIDENTIAL